

1 ANDREW D. HEROLD, ESQ.  
Nevada Bar No. 7378  
2 JOSHUA A. ZLOTLOW, ESQ.  
Nevada Bar No. 11333  
3 HEROLD & SAGER  
4 3960 Howard Hughes Parkway, Suite 500  
Las Vegas, NV 89169  
5 Telephone: (702) 990-3624  
Facsimile: (702) 990-3835  
6 [aherold@heroldsagerlaw.com](mailto:aherold@heroldsagerlaw.com)  
7 [jzlotlow@heroldsagerlaw.com](mailto:jzlotlow@heroldsagerlaw.com)

8 Attorneys for Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS  
SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL  
9 SPECIALTY LINES INSURANCE COMPANY

10  
11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 AIG SPECIALTY INSURANCE COMPANY  
F/K/A CHARTIS SPECIALTY INSURANCE  
14 COMPANY AND ALSO AMERICAN  
15 INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY, an Illinois  
16 Corporation,

17 Plaintiff,

18 vs.

19  
20 LIBERTY MUTUAL FIRE INSURANCE  
COMPANY, a Massachusetts Corporation,

21 Defendant.  
22  
23

CASE NO. 2:17-cv-01260-APG-NJK

**STIPULATION AND ORDER  
EXTENDING TIME FOR AIG  
SPECIALTY INSURANCE COMPANY  
F/K/A CHARTIS SPECIALTY  
INSURANCE COMPANY AND ALSO  
AMERICAN INTERNATIONAL  
SPECIALTY LINES INSURANCE  
COMPANY'S TO FILE OPPOSITION TO  
LIBERTY MUTUAL'S RENEWED  
MOTION TO STAY FEDERAL COURT  
DECLARATORY JUDGMENT ACTION  
PENDING RESOLUTION OF  
UNDERLYING COURT ACTION**

**(FIRST REQUEST)**

24 Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY  
25 INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES  
26 INSURANCE COMPANY ("AISLIC") and Defendant, LIBERTY MUTUAL FIRE INSURANCE  
27 COMPANY ("Liberty" and collectively, with AISLIC the "Parties"), by and through their

28 ///

1 attorneys of record, and pursuant to Local Rules 6-1(a)(b)(c) and 6-2, hereby stipulate and agree as  
2 follows:

3 WHEREAS, Defendant filed its Renewed Motion to Stay (**ECF No. 51**) on August 9, 2017;

4 WHEREAS, Plaintiff has requested, and Defendant has consented to, an extension of time  
5 to respond to Defendant's Renewed Motion to Stay to August 30, 2017;

6 WHEREAS, Plaintiff's handling attorneys are either out of the country or are otherwise  
7 unavailable during the time frame before the opposition's current due date;

8 WHEREAS, Fed.R.Civ.P. 6(b) requires the Court to approve an extension of time for  
9 Plaintiff to file a response, and therefore the Parties collectively request the Court approve the  
10 stipulation, as set forth below:

11 a. This is the Parties' first stipulation for enlargement of time to answer Defendant's  
12 Renewed Motion to Stay;

13 b. The Parties stipulate and agree that the deadline for Plaintiff to file a response to  
14 Defendant's Renewed Motion to Stay shall be extended to August 30, 2017.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

c. This stipulation is not made for purposes of delay.

DATED: August 15, 2017

HEROLD & SAGER

By: /s/ Andrew D. Herold

ANDREW D. HEROLD, ESQ.

Nevada Bar No. 7378

JOSHUA A. ZLOTLOW, ESQ.

Nevada Bar No. 11333

Attorneys for Plaintiff AIG SPECIALTY  
INSURANCE COMPANY F/K/A CHARTIS  
SPECIALTY INSURANCE COMPANY AND  
ALSO AMERICAN INTERNATIONAL  
SPECIALTY LINES INSURANCE COMPANY

DATED: August 15, 2017

DUANE MORRIS, LLP

By: /s/ Dominica C. Anderson

DOMINICA C. ANDERSON, ESQ. SBN 2988

DANIEL B. HEIDTKE, ESQ. SBN 12975

Attorneys for Defendant LIBERTY MUTUAL  
FIRE INSURANCE COMPANY

IT IS SO ORDERED August 16

\_\_\_\_\_, 2017.

  
\_\_\_\_\_  
U.S. DISTRICT MAGISTRATE JUDGE